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SPECIAL COUNSEL TO THE TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE:	§	
	§	
MCCLAIN FEED YARD, INC., et al.,¹	§	CASE NO. 23-20084-RLJ-7
	§	
	§	
Debtors.	§	Jointly Administered

MOTION FOR EXPEDITED SETTING ON FIRST INTERIM FEE APPLICATIONS

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

Quilling, Selander, Lownds, Winslett & Moser, P.C. (“QSLWM”), special counsel to Kent Ries, Trustee (“Trustee”) of the referenced Chapter 7 bankruptcy cases, and Lain, Faulkner & Co., P.C. (“LainFaulkner”), accountants to Trustee, file this Motion for Expedited Setting on First Interim Fee Applications:

3. On April 19, 2024, QSLWM filed its First Interim Application for Allowance of Fees and Expenses (Dkt. No. 224) on 21-day negative-notice. On April 25, 2024, LainFaulkner likewise filed its First Interim Application for Allowance of Fees and Expenses (Dkt. No. 228) on 21-day negative-notice.

4. Since filing the QSLWM application on April 19, 2024, the undersigned counsel has been attempting to coordinate schedules and a setting in the event a hearing is required on

¹ The Debtors in these Chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

the applications. The undersigned counsel has a conflict with the Court's May and June Amarillo docket call days, but both counsel and LainFaulkner are available on the scheduled Amarillo hearing dates on May 20 or 21. Other counsel with QSLWM can be arranged for the May 16 docket call for the purpose of announcing a time estimate for a hearing if such is required.

5. The parties request the Court to set this matter for a hearing, if possible, in order to allow for a May 20 or 21 hearing if one is necessary. If the Court prefers to wait to set the exact day and time until at the May 16 Amarillo docket call, the parties request the Court to set both Applications for the May 16 Amarillo docket call for the purpose of fixing the later hearing day and time. The parties do not anticipate the need for witness testimony to an extent that would require in-person attendance, and thus submit that a remote hearing would be sufficient.

Respectfully submitted,

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By: /s/ Hudson M. Jobe
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served concurrently with filing by ECF upon all persons who have filed ECF appearances in this case, including the Office of the United States Trustee.

/s/ Hudson M. Jobe
Hudson M. Jobe